

Appendix B

Response to Public Comment on Draft CCP/EA

Summary of, and the Service's Response to, Public Comments Received on the Draft Comprehensive Conservation Plan and Environmental Assessment (CCP/EA) for Eastern Shore of Virginia and Fisherman Island National Wildlife Refuges.

April 2004

Introduction

In March 2003, we completed the Draft Comprehensive Conservation Plan and Environmental Assessment (Draft CCP/EA) for Eastern Shore of Virginia and Fisherman Island National Wildlife Refuges (NWRs). The Draft CCP/EA outlined four alternative scenarios for managing the two refuges over the next 15 years. We identified Alternative B as the "Service's Proposed Action" in this document. It is the alternative we recommended to best achieve the Refuge System mission, and refuge purposes and goals. The Draft CCP/EA was released for 45 days of public review from September 26 to November 10, 2003.

We have evaluated all written and oral correspondence received during the public comment period. This document is our response to the substantive comments we received. Based on the analysis in the Draft CCP/EA, and our evaluation of public comments, we have modified our Proposed Action to include the following changes:

- 1) We will complete a wilderness review on both the Eastern Shore of Virginia and Fisherman Island NWRs within three years of final CCP approval;
- 2) We will also evaluate Skidmore and Fisherman Islands for their Research Natural Area potential within three years of final CCP approval;
- 3) We will coordinate with other authorities to ensure Formerly Used Defense Sites (FUDS) are secure and do not pose a safety hazard before we allow unrestricted access in their vicinity; and
- 4) We will modify our habitat prescription in Management Unit 8 on Eastern Shore of Virginia NWR to promote a shrub habitat type.

We will ask our Regional Director to review and approve the revised Proposed Action which we have developed into a final CCP. It is also required that the Director review and approve or deny the Land Protection Plan (LPP). If both are approved, the Regional Director will issue a Finding of No Significant Impact (FONSI). The FONSI is the decision document that certifies that the final CCP will have no so significant impact on the human environment, therefore, allowing us to begin the implementation phase.

Summary of Comments Received

A total of 33 individuals, agencies, and organizations provided comments by way of oral testimony at public hearings or through submission of written or electronic documents.

We held 3 formal public hearings as follows:

October 8, 2003, 6:30-9:00 p.m., Lake Wright Inn, Norfolk, VA

October 9, 2003, 2:00-4:00 p.m., Northampton High School auditorium, Eastville, VA

October 9, 2003, 6:30-9:00 p.m., Northampton High School auditorium, Eastville, VA

Nine oral testimonies were given at the public hearings; 1 in Norfolk and 8 in Eastville. Some people at the public meetings submitted their comments in writing instead of giving oral testimony, while others did both. Written responses came in the form of letters and electronic mail.

We received 9 written comments from local and State Governments, including:

- Board of Supervisors of Northampton County
- VA Department of Game and Inland Fisheries
- VA Department of Environmental Quality
- VA Department of Conservation and Recreation
- VA Marine Resources Commission
- VA Department of Historic Resources
- Virginia Institute of Marine Science
- Chesapeake Bay Local Assistance Department
- Accomack-Northampton Planning District Commission

We received 4 written comments from local and national conservation and recreation organizations, including:

- The Wilderness Society
- The Nature Conservancy
- Citizens for a Better Eastern Shore
- Coastal Virginia Wildlife Observatory

We received 11 written responses from individuals, including:

- 6 written comments from the public hearings
- 2 electronic mailings
- 3 written letters

In the following discussions, we identify the issues and comments raised during public scoping and our responses to them. We make some references to the full-text version of the Draft CCP/EA. The full-text version is available on-line at <http://northeast.fws.gov/planning>. For a paper copy, call Eastern Shore of Virginia National Wildlife Refuge Headquarters at (757) 331-2760.

Habitat and Wildlife Management

Comment: The Virginia Institute of Marine Science (VIMS) asked the Service to delineate, map and create a management plan for all non-tidal wetlands in the current and proposed acquisition boundary. According to VIMS, these non-tidal wetlands play an important role for wildlife and ecological functions, and are increasingly threatened by development. “Unless identified and prioritized for acquisition,” wrote VIMS, “the refuge may miss opportunities to include these areas and their unique contributions to the ecosystem.”

Response: We appreciate VIMS perspective and confirmation of the important functions the wetland habitats provide. The Service’s National Wetlands Inventory program has delineated and mapped all tidal and non-tidal wetlands for Northampton and Accomack Counties. They are increasingly threatened by drainage, conversion, and development. Measurements in the draft LPP (Draft CPP/EA, Appendix K) show that approximately 23% of the proposed acquisition area is wetland, as follows: forested wetland, 460 acres (8%); tidal marsh, 725 acres (12%); open water, 120 acres (2%); and shrub/freshwater marsh/wet meadow, 25 acres (<1%). The final LPP is Appendix E in this final CCP.

The majority of wetland acreage proposed for acquisition is located on lands designated Priority 2; one of four LPP priority categories defined in the LPP. Any lands that become available within this area will give us the opportunity to protect and manage significant tracts of wetland, and offer the potential for wetland restoration where former wetland/hydric soils have been cleared and converted to low-lying farmland.

Comment: The Wilderness Society (Society) asked that we expand our discussion of the National Wildlife Refuge System Improvement Act of 1997 (NWRSA) in Chapter 1 to include specific wording on our responsibility to “maintain the biological integrity, diversity and environmental health of each refuge” and to “monitor the status and trends of fish, wildlife and plants on each refuge.” The Society also requested that we indicate how the Service will accomplish these responsibilities under each alternative. Furthermore, the organization recommended a “separate monitoring and evaluation appendix that lays out the purpose, observation timeline, specific questions, and specific protocol for each monitoring action on both refuges. A strong monitoring and evaluation program is the key to good refuge management.”

Response: Our reference to the NWRSA in Chapter 1 was made to give context for why we are completing a CCP. There are many other elements of the NWRSA that could be referenced, including the clauses related to monitoring and biological integrity, diversity, and environmental health. Section 5 of the NWRSA lists 14 separate mandates the Secretary must meet in administering the System. The Draft CCP/EA addressed the majority of the mandates found in the NWRSA.

We agree that monitoring and evaluating our actions is vital to making sound, science-based management decisions. Our final CCP will commit us to completing an Inventory and Monitoring Plan (IMP) by 2006. The IMP is a step-down management plan required by Service Policy 701 FW 2, Inventory and Monitoring of Populations. The IMP guides the collection of data on species of management concern to the refuges. Moreover, all strategies in the draft CCP/EA that mentioned monitoring will be included in the IMP. A Habitat Management Plan (HMP) is another required step-down plan, which we will complete prior to the IMP in 2005. It will finalize habitat management schedules and strategies from which many inventory and monitoring protocols will be determined.

Comment: The Society commented on our use of the term “federal trust resources,” to refer to endangered species, migratory birds, and inter-jurisdictional fish species. They said it is inappropriate for us to focus management on “federal trust resources” because the Service’s mission statement mandates we protect all fish, wildlife, and plants on national wildlife refuges.

Response: “Trust resources,” is a term used within the Service to refer to species whose welfare is specifically entrusted to the Service by statute or treaty. The Service’s management for the other resident wildlife on national wildlife refuges emphasizes the protection of breeding stocks and the production of native wildlife to achieve or maintain species diversity which naturally occurs or historically occurred on refuges. The special interest of various States in managing resident wildlife is recognized and we coordinate with respective State management objectives, where possible.

Comment: The Society called “overly simplistic” our assertion in the draft CCP/EA (p. 4-72) that Alternative D’s emphasis on forested habitat would have a “negative impact on habitat diversity.” Conserving biological diversity does not necessarily mean maximizing species richness; instead, it could mean restoring and maintaining a single habitat or species that is suffering severe or rapid declines in the region.

Response: The reference in the Draft CCP/EA is to the diversity of habitat types on the refuge, not to biological diversity. The Society correctly notes that contributing to biological diversity can mean simplifying a landscape to a single vegetative community, if that is all that should naturally occur there. While Alternative D would make the greatest contribution of the four alternatives to natural biological diversity within the lower Delmarva Peninsula, it would still simplify the number of habitat types found within refuge boundaries.

Comment: The Society recommended that the final CCP contain more information on the regional ecological context within which the refuges are located. Such information should include historic habitat types, current and future habitat trends, and habitat needs for rare and declining species. The Society stated that, in the absence of this information the Service should focus on “maintaining and restoring the natural dynamics of the ecosystem.” Further, the Society said the Service could make a case for Alternative B; however, “by demonstrating in the plan that shrub and grasslands habitat not provided for under Alternative D are critically important and that the refuge can play a substantive role in providing those habitats.” Finally, the Society recommended these habitat management decisions be made in the context of the LPP.

Response: The Draft CCP/EA recognizes that we do not have extensive information on the historical ecological context and ecological dynamics. We believe, however, that the Draft CCP/EA contains the information necessary to provide a regional ecological planning context for the refuges. There is extensive information concerning species, habitat needs, and the role of the refuges in the various descriptions of other ongoing, landscape-scale planning initiatives (e.g., Partners in Flight), described in Draft CCP/EA (Chapter 1). Chapter 3 also discussed historic and current land use trends, and notes the continued habitat degradation predictable from further development. It also contains descriptions of wildlife present in the area.

Choosing Alternative B as the Proposed Action is based on the hemispheric importance of the refuge to Neotropical and temperate migrants that rely on the complex of habitats, especially the hardwood understory, shrubs, grasslands, and the food sources that they represent. This justification is found most readily in the Vision Statement (Draft CCP/EA, Chapter 1) and in the rationales for the objectives in Chapter 2 (Draft CCP/EA, Alternative B, Goal 1). Finally, we contend that the LPP does put the habitat decisions in context of their importance.

Comment: The Society commented that one of the plans “principal shortfalls is that it does not contain a wilderness review. The Plan not only fails to examine whether refuge lands currently qualify for wilderness designation, but the Plan also fails to dictate when the Service will conduct a formal wilderness review.”

Response: A site visit to assess wilderness characteristics of both refuges was conducted in 1999. When examining Fisherman Island Refuge, we discussed the need to further evaluate the impacts caused by the artificial structures such as the four-lane highway that cuts through the island. A small road also exists on the island, which allows access by refuge staff and researchers. We did not complete our review and concluded that a more in-depth study is needed. Therefore, the final CPP will require that we complete a wilderness review of both refuges within three years of CCP approval.

Comment: The Society recommends designating Fisherman Island and Skidmore Island as Research Natural Areas, as proposed in Alternative D.

Response: We agree that these islands should be evaluated for their Research Natural Area potential. As such, the final CCP will require that we conduct this evaluation concurrent with the wilderness review. It will be completed within the same time frame; that is, three years after CPP approval.

Comment: One individual asked what qualifies as “wildlife.”

Response: The NWRSA provides a formal definition in Section 5(7): “The terms ‘fish,’ ‘wildlife,’ and ‘fish and wildlife,’ mean any wild member of the animal kingdom whether alive or dead, and regardless of whether the member was bred, hatched or born in captivity, including a part, product, egg, or offspring of the member.”

Comment: A private resource manager had several comments on our proposed vegetation management. He suggested focusing on the elimination of invasive plant species as the first step in trying to develop desired habitat conditions. In addition, he suggested developing Management Unit 8 (MU-8) into a maritime evergreen/loblolly vegetation community rather than a hardwood forest community, as proposed in Alternative B, to be more consistent with the surrounding habitat types. Finally, this individual suggested converting MU-3 to grassland habitat, rather than shrub habitat, since it is the southernmost field on the peninsula and is surrounded by mature forest that provides a shelter or stopover area for migrating birds and butterflies.

Response: We appreciate the reviewer's concerns with the need to control, if not eliminate, invasive plants. Control of invasive plants is a national priority for the NWRs. Elimination of invasive plants will be a management priority in areas where these plant species have a stronghold (Draft CCP/EA, Alternative B, Goal 1). With regards to MU-8, upon further review, we would manage most of this area as shrub because of the wetter soils and high salt spray. However, on a small area, where the elevation is higher and soils are drier, we will manage it as hardwood forest. This management strategy will be reflected in the final CCP and HMP.

With regards to the suggested change of MU-3, we described in the Draft CCP/EA (Chapter 3) that research shows a minimum field size is important for migrating and wintering grassland-dependent birds. Additionally, its location on the tip of the peninsula is not critical to grassland migratory birds. This MU is approximately 1 hectare in size and does not meet the minimum useful size (10 hectares) for this suite of species. However, its location is critical for Neotropical migrant birds and will provide critical food sources if it is maintained in shrub/scrub. Therefore, we believe maintaining this area as shrub/scrub fills its highest and best use for migrant birds in the area.

Land Protection

Comment: The Virginia Department of Game and Inland Fisheries (VDGIF) wrote; "The acquisition of 2,500 acres of land (1,500 acres targeted for grasslands restoration and 1,000 acres within the areas identified by the Delmarva Conservation Corridor analysis) between the 10 km zone and the town of Cape Charles as stated in the 1999 Preliminary Project Proposal (PPP) has been eliminated in the draft CCP. The primary purpose of acquiring these lands was to provide grassland-obligate bird species with early successional migration, winter and breeding habitats. We feel that the purchase of the 2,500 acres represented an essential component in the PPP's land acquisition plan and strongly recommend that it be included in the final CCP.

Response: We appreciate the opportunity to clarify our land protection proposal. First, we assure you that the original 2,500 acres identified as 'hubs' and grasslands in the PPP have not been entirely eliminated.

As the name suggests, the PPP identifies a preliminary proposed. Upon receiving the Director's approval in May 2001, we were given consent to prepare a more detailed LPP. Our PPP acreage estimate for lands within the 10-km zone study area was 4,000 acres. This estimate excluded existing conservation lands, major subdivisions and villages. The PPP also proposed land protection between the 10-km zone and Cape Charles, including 1,000 acres of "hub" habitat (primarily the Plantation Creek marsh/forest complex), and a grassland restoration target of 1,500 acres (recommended during a biological experts' workshop). This was an estimated project total of 6,500 acres.

The LPP's refined acquisition area extends north of the 10-km zone on the bayside, to include part of the Plantation Creek hub (lands between Cheapside and Plantation Creek). Meetings with the major landowner north of Plantation Creek made it clear that lands on the north side would never be available, so they were not included. We also slightly widened the original 1.5 km strip so that the proposal corresponded with property

boundaries and identifiable features (Routes 645 and 600).

We originally sought to incorporate grassland restoration as a “floating” target acreage, rather than identify specific tracts, to be restored (from farmland) between the 10-km zone and Cape Charles. Grassland habitat need not be within the 10-km zone to benefit grassland bird species. However, current Service guidance on preparing LPPs requires identification of specific tracts proposed for acquisition.

Rather than eliminate this acreage from the proposal, we accommodated a portion of it in the LPP by expanding the 10-km zone to the north, widening it to have distinctive features on the ground, and by including an objective for the 6,030-acre expansion area “to restore several large grassland tracts from agricultural lands as opportunities occur, to provide migration, breeding and wintering habitat for declining grassland bird species.” There are over 3,000 acres of farmland within the LPP boundary, and some of this acreage will be restored to grassland as opportunities arise. The only difference is that these grasslands will be within the 6,030-acre boundary.

In summary, the LPP boundary, while reduced from the original 6,500-acre proposal, now measures approximately 6,030 acres. The potential to restore grassland has been incorporated into the 10-km acquisition boundary. The boundary has been expanded further north to include some hub acreage, is slightly wider than the 1.5 km zone, and still allows for grassland restoration.

Comment: The Virginia Department of Conservation and Recreation and the Virginia Department of Environmental Quality’s Water Division both wrote in support of the LPP. The LPP “will likely result in the protection of large areas of surface waters and key habitat for threatened and endangered species as well as additional species of concern,” wrote the Water Division. The Virginia Coastal Program encouraged the Service to “maximize the amount of land under consideration for acquisition on the [southern] tip.” The Coastal Program suggested extending the land protection boundary as far north as possible “given the probability that many landowners in the far southern tip may not be willing to sell.”

Response: We appreciate your support for the LPP and recognize the efforts your agencies have achieved to protect some of these same habitats and resources on the lower Eastern Shore of Virginia. Concerning the northward extension of our proposed boundary, please see our response to VDGIF above.

Comment: The Virginia Marine Resources Commission (VMRC) reminded us that it manages all ungranted shores of sea, marsh and meadowlands. This includes 28,507 acres of ungranted state lands on Virginia’s Eastern Shore, of which 27,722 acres are located on the seaside between the barrier islands and the mainland. The rest is located on the Chesapeake Bay side.

Response: We recognize the State’s jurisdiction and authority on all ungranted lands under the Code of Virginia, Article 2 (§ 28.2-1503 et Seq.). We have reviewed the accompanying map submitted with this comment, which identifies ungranted lands in the project area, and will request a meeting with the VMRC for clarification on certain areas.

Comment: One individual, as well as Costal Virginia Wildlife Observatory (CVWO), The Nature Conservancy (TNC), and the Wilderness Society (Society) supported the Service’s proposal to expand the refuge for purposes of protecting additional wildlife habitat. The Northampton County Board of Supervisors also supported the LPP and encouraged the Service to work with its citizens “to develop a land acquisition program that is voluntary and mutually beneficial to all.”

TNC noted that the Alternative B expansion would support the efforts of the Southern Tip Partners group, a

partnership of local representatives and Service employees that has promoted and facilitated protection of the area's natural resources while encouraging sustainable economic development and ecotourism. Alternative B would also support recent efforts by Northampton County to preserve open space, said TNC.

Response: Again, we would like to thank these agencies and organizations for their support of our land acquisition program. It is through these types of partnerships that we can protect the natural resources of Northampton County while encouraging sustainable development.

Comment: The Society recommended we offer a more concrete proposal on the relative amount of forest, shrub and grassland that we would restore and maintain on lands proposed for acquisition. They also recommended strengthening our commitment to restore farmland to native habitat.

Response: Our main concern is to protect and restore Neotropical and temperate bird migration habitat, primarily forests and shrub lands, in order to widen and reconnect the vegetated migration corridor in the lower Delmarva Peninsula. We have also pledged to look for opportunities to restore several large grassland tracts to native warm-season grasses, from agricultural lands, based on recommendations from our biological expert's workshop.

In the Draft CCP/EA (Chapter 2) and in the LPP, we make a firm commitment that acquired agricultural lands will be restored to hardwood forest and shrub habitats. However, individual tracts have not been delineated as to how each would be restored to native habitat types (i.e., forest, shrub, grasslands). There are 172 identified tracts, and specific management decisions will be determined when, and if, these tracts are acquired. As such, the objectives in the LPP are stated in a more general way for the overall expansion area.

Part of our reasoning is that as development and other changes occur on the peninsula, it is possible that one habitat type will become more critical than another. Additionally, the location, surrounding habitats, soils, etc. should be taken into account when making those decisions. It is also worth noting that, given our willing-seller policy, it is hard to predict exactly where and in what configuration lands will be acquired and managed over time. If the surrounding habitat is mature hardwood and the soils lend themselves to hardwood forest, then this will likely be our management strategy. However, if the surrounding area is agriculture and the tract is small, we may decide to re-vegetate into a shrub/scrub habitat if the soils will support this.

Due to the large number of tracts, the timeline for acquisition is very long, and the potential for numerous changes and development within the acquisition boundary area is high. Therefore, we feel it would be best to make specific decisions (beyond restoring to native habitats) when the lands are acquired and these conditions can be assessed.

Hunting

Comment: The Society identified concerns about the safety of the current and proposed hunting zones on the Eastern Shore of Virginia Refuge both for hunters and other refuge visitors, mentioning specifically the size of the hunt zones and their adjacency to roads and trails. They questioned if the hunt programs are being reviewed annually and what data the refuge has collected on accident rates. One individual commented that during the hunt season, hunters do not always stay in their assigned areas, and will sometimes wander into other areas. The Society also expressed concern about minimizing conflicts between hunting and other priority public uses.

Response: Prior to opening the Eastern Shore of Virginia NWR to hunting in 1992, we worked with the VDGIF to determine the safe number of hunters for each hunt zone. Zone size, shape and habitat were taken

into account when making these decisions. No hunt accidents have occurred on this refuge. As we stated in Chapter 2 of the Draft CCP/EA, we will work with State and Federal partners in the near term to determine if the number of hunters per zone are still appropriate and safe.

Each year, we will continue to complete an annual hunt plan and submit it for review and approval by both our regional biological and visitor services specialists. They review these documents for compliance with Service mandates and policy, and to make recommendations for improving the quality of the hunt program. A high quality hunt includes ensuring safety and minimizing user conflicts. Our programs are designed to also accommodate non-hunting visitors during the hunting seasons. We have several areas that remain open for wildlife observation and photography during the hunting season. For example, if visitors arrive on a gun hunt day, they can enjoy the Visitor Center, photo blind and surrounding wildlife areas. During the archery hunt, all walking trails are also open to the general public.

A full-time Refuge Law Enforcement Officer will be employed to provide increased vigilance during the Refuge hunts. The Officer will enforce fish and wildlife laws and refuge regulations, including hunter assigned area compliance.

Comment: We received comments about the refuge deer hunt conflicting with the migration of certain birds and causing “unreasonable damage” to migratory bird habitat by hunters walking through areas where these birds feed and rest. One individual questioned the implication that hunters walking through Fisherman Island NWR would cause less damage to the vegetation and the soil than birders. The individual further questioned why birders on Fisherman Island NWR are limited to a trail and deer hunters would not be.

Response: The existing deer hunt program on Eastern Shore of Virginia NWR occurs during the State regulated archery and gun hunting seasons. Archery season is approximately 12 days from late October to early November and gun season is approximately 7 days from mid-November to mid-December. The majority of migratory birds have moved through the refuges by mid-November. As such, it is the archery season that corresponds more closely with the time the high numbers of migrating birds are in the area. The current refuge deer hunt is designed to reduce degradation of migratory bird habitat caused by an overabundance of deer. Studies have shown that a high density of deer can have a significant adverse effect on forest understory and shrub vegetation; habitats of particular importance to Neotropical migrant birds. We have observed this habitat degradation from deer on the refuge; and reducing these impacts is a management priority.

Because we are concerned with the increased access and the resulting potential for ecological impacts to Fisherman Island Refuge, our Proposed Action is to implement a management deer hunt only if annual monitoring shows a significant decline in habitat quality due to over-browsing. We will evaluate the need for this hunt each year.

We recognize that foot traffic could impact sensitive soils and habitat on both refuges, regardless of whether the activity is hunting or bird watching. However, it is also true that hunters tend to disperse for safety and scouting reasons and we have not observed any environmental impacts in areas we currently have open to hunting. Moreover, on Fisherman Island NWR, it is likely that hunting would be required from stands, which would alleviate some habitat disturbance. Habitat monitoring and analysis of both refuges’ hunt areas will occur on an annual basis.

Comment: We received comments requesting the addition of a muzzleloader season to the deer hunt on Eastern Shore of Virginia NWR, adding a doe season with a special fee, and a request to raise the hunt fee to \$20 and allow crossbow use for disabled hunters.

Response: As we described in the Draft CCP/EA (Chapter 2; Alternative B: Proposed Action) we plan to work with our State partners to review our current hunt program. This review will include an evaluation of numbers and distribution of hunters and type and method of hunt. Our primary objective will be to reduce deer numbers, while offering a safe, high quality hunt at times which minimize impacts to migratory birds. During our review, we will consider a doe-only hunt and allowing muzzleloaders during the refuge firearms hunt if it meets our objectives. However, at this time, we do not foresee adding a special muzzleloader hunt coincident with the current state muzzleloading season. Our concern is that the State's early muzzleloading season typically falls when Neotropical migrant birds are abundant in the area (late August to mid-November).

With regards to disabled hunters, those who meet the criteria established by State regulations are allowed to use crossbows during the archery hunt. Finally, a fee increase is included in the Proposed Action to \$30 per hunter. This would help defray the administrative costs of the hunt.

Comment: An individual questioned the scientific basis for the current Eastern Shore of Virginia Refuge white-tailed deer hunt. Specifically, the individual wanted to know who ran the studies and how, when and where the studies were done. Finally, the individual wanted to know the exact number of the deer population on both refuges.

Response: An abomasal parasite count (APC) was conducted by the State prior to the establishment of the hunt on the Eastern Shore of Virginia NWR. This count is an accepted method in the southeastern United States for evaluating deer populations in relation to the available food supply. The APC count for the deer on the refuge was 23% above recommended levels. Additionally, spotlight censuses and habitat studies were conducted along with a review of the number of vehicle/deer collisions in lower Northampton County. All of these factors pointed to the need to reduce the number of deer on the refuge in order to improve deer health as well as the habitat quality for migratory birds. Hunting is a management tool that is used to achieve this objective. In addition, the deer hunt is a priority wildlife-dependent recreational use of the National Wildlife Refuge System as mandated by the NWRSIA.

We do not know the exact population of deer on either refuge. The nature of surveying white-tailed deer on an open property does not produce exact numbers. The surveys we conducted provided an index of the number seen, browse lines, deer condition and population trends. From these results, we can formulate management decisions to enhance habitat and provide wildlife-dependent recreational opportunities.

Fishing

Comments: The Virginia Department of Conservation and Recreation encouraged the Service to open a portion of the southern tip beach at Eastern Shore of Virginia NWR to "limited surf fishing." One individual suggested providing access to the beach near the Chesapeake Bay Bridge-Tunnel (CBBT) property for surf or pier fishing.

Response: We considered opening both these areas, the southern tip beach and the beach near the CBBT, to surf fishing. However, neither area has existing, public overland access and creating access on refuge lands would degrade important habitat areas. Access by water is dangerous at the beach near the CBBT because it is located near the confluence of the Chesapeake Bay and Atlantic Ocean and has very strong currents. Directly in front of a section of this beach are commercial clam beds that would be destroyed if people were to land boats or walk over them. Additionally, opening an area adjacent to the bridge abutments would not be prudent as far as security of the bridge is concerned.

Consideration for surf fishing on the southern tip beach was abandoned because of the presence of the Federal-listed (threatened) Northeastern beach tiger beetle. Although the beetle can withstand some human pressure, we do not have information that would help us determine limits at this site. With our “wildlife first” mandate, we decided it was best to focus our fishing opportunities at the Wise Point boat ramp. In addition, discussions with personnel from Kiptopeke State Park (3 miles north) verified that surf fishing at the park is underutilized at this time.

Comment: Two individuals suggested opening Fisherman Island NWR to surf fishing, either on a permit or fee basis. It was suggested that anglers could arrive by boat and anchor just inside the tidal flat area. Another individual stated that Fisherman Island should not be open to surf fishing.

Response: We do not propose opening up Fisherman Island NWR to surf fishing due to our concern with impacting nesting and migrating birds and our concerns with visitor safety. Fisherman Island NWR is used by a large number and diversity of beach nesting birds from March through September. Some species, such as the brown pelican and royal tern, are colonial nesting birds and congregate in large numbers in specific areas. However, other species, such as the American oystercatcher, are individual nesters and are dispersed along the entire perimeter of the refuge. The U.S. Shorebird Conservation Plan lists the American oystercatcher as a species of high concern; the Regional plan, which includes Virginia, lists the oystercatcher as a species of highest regional conservation priority. Annual surveys along the Virginia barrier islands since 1979 have shown that the oystercatcher population has declined by over 60% in the last two decades (Wilke, 2004). These birds are inherently shy and sensitive to human disturbance (Wilke, 2004). Additionally, the Federal-listed (threatened) piping plover uses the refuge beaches during migration and has historically nested on the refuge. Also, with regards to visitor safety, the tidal flats at Fisherman Island are quite extensive and anchoring within the flats has stranded a number of boaters, some for several hours, over the years. We decided to not allow surf fishing along the refuge beach because of the likelihood of human disturbance to nesting and migratory birds of high conservation concern during critical times of the year, and because of safety reasons.

Boating and Fishing Access at Wise Point Boat Ramp

Comment: Several individuals commented on the Service’s proposal for managing the Wise Point boat ramp. The comments included building a separate boat ramp for recreational anglers, continue to use the existing boat ramp, and work with Northampton County to build a new parking area and boat ramp on Raccoon Park (County-owned property) for recreational use. Additional comments included proposing a new ramp for recreational anglers to be built farther south on the former Wise Point property, and providing two boat ramps to eliminate delays for recreational anglers.

Response: The mission of the Service is to manage fish and wildlife resources and, where compatible, wildlife-dependent recreational activities. Therefore, the main purpose of this boat ramp is to facilitate wildlife-dependent recreational activities. However, we realize the importance of this access point to commercial watermen and the importance of the commercial fisheries to Northampton County. We are committed to assist this commercial use within certain guidelines. Building two boat ramps within a few hundred yards of each other does not make fiscal sense, especially when one considers that Raccoon Creek would need to be dredged in order to be useful as a launch site and that the major limiting factor in this area is adjacent uplands for parking. The area proximate to the CBBT span is not appropriate for reasons delineated in the response to surf fishing above. In Chapter 2, our Proposed Action is designed to alleviate delays due to commercial off-loading by construction of a commercial off-loading site.

Comment: A commercial waterman who utilizes the Wise Point boat ramp said he would like to retain his privilege to use the boat ramp and he would like to see some improvements to the ramp, the parking area and the docking area.

Response: This individual would retain his privileges to use the Wise Point boat ramp as delineated in the Proposed Action in Chapter 2. We propose to upgrade the ramp, parking, and dock areas as described in the Draft CCP/EA.

Comment: Another commercial waterman pointed out that one of the Service's obligations is to provide recreational opportunities for the public and, as of this time, the Service is not doing that. He also said the proposal in Alternative B for satellite parking for commercial watermen is not a viable option. After bringing their catch ashore, commercial watermen cannot take the extra time to retrieve their vehicle from satellite parking, especially during the hot summer months, because their catch could spoil.

Response: It is true that we have closed the boat ramp to recreational use at this time is. Our responsibility is to provide a safe and positive experience. When we purchased the property, it was apparent that there were numerous safety issues and we could not open the area to general use without first eliminating these concerns. We have been working hard to obtain funding, permits, engineering designs, and other necessary elements so that we can move forward with the improvements and re-open the area to recreational use. There will be a number of parking spaces adjacent to the boat ramp that will be available on a first-come, first-served basis. During the majority of the year those spaces will be open. We will recommend to commercial watermen that they carpool when possible to reduce the number of vehicles in the area. If it is necessary to park in the overflow parking area, one person can go for the vehicle while others are readying the catch for off-loading and preparing the vessel for overnight docking or trailer use.

Comment: Two individuals wrote in support of Alternative A's proposal for managing the Wise Point boat ramp. Under that Alternative, the Service would manage the boat ramp similarly to the way the Wise Point Corporation managed the boat ramp prior to selling it in 2001. Another individual suggested giving preferential treatment to at least some of the "previous keyholders," or the recreational anglers who had access to the boat ramp when it was owned by the Wise Point Corporation. This individual also recommended we randomly choose which of the previous keyholders would be afforded this preferential treatment by holding a lottery.

Response: In Alternative A, minimal improvements would be made to the road and boat ramp and the area would be open to just those 120 recreational anglers and 21 commercial watermen that held a permit with the previous landowner. Although this may be desirable to the 141 people that would gain preferential access, it is not a viable option for a Federal agency managing lands in the public trust. A private corporation does not have the responsibilities and expectations that a federal agency has in providing balanced and safe opportunities to the public. It is important to note that previous keyholders will not be denied access in the proposed alternative.

Comment: We received several comments concerning access to the Wise Point boat ramp. The comments included allowing both recreational anglers and commercial watermen unlimited access, 24-hours a day, seven days a week; allowing only commercial watermen such access; installing one-way treadles on the boat ramp entrance road so users could exit any time of the day or night, and using an honor system for fishing and launching after hours.

Response: We are presently proposing to open the ramp during daylight hours with extended hours during certain fishing seasons. We will review the demand and identify problems after the ramp has been open for one year and periodically thereafter. Although there will be specific hours of operation, we are planning to install a

one-way exit system, as described on page 4-18 of the Draft CCP/EA, for boaters that have problems and cannot return prior to the hour of closure. We have spoken with Northampton County board members concerning the need to install a gate but have not yet submitted a proposal to the Board of Supervisors for approval. Northampton County owns property that this gate would affect. There will likely be a ramp use honor system during certain hours and seasons.

Comment: One individual who called himself “an advocate for commercial and recreational water access from the Refuge” wrote that he has heard plans for ramps and dockage is “still swirling in controversy” and that new options may be proposed, “but I believe we need to move forward – not backward.” He urged approval of the final CCP and “then rapid movement to fulfill the Service’s commitment to provide meaningful commercial and recreational water access from the Refuge.”

Response: We appreciate this individual’s concern. The public comment period is an important element of the process to ensure that the needs and desires of the community are heard and responded to. Good suggestions are often introduced during this process that need to be considered. Once a final CCP is approved, we will move forward with the boat ramp development decision as a very high priority.

Comment: One individual, who asked that the boat ramp be reopened to recreational anglers as soon as possible, commented that the only way to canoe, hunt, take pictures or engage in any recreation is through the boat ramp.

Response: Northampton County currently provides access for canoes, kayaks, and other small boats at Raccoon Creek. Additionally, there is boat access at the towns of Oyster and Cape Charles, and at Kiptopeke State Park. As stated above, we are moving as quickly as possible to open the Wise Point boat ramp.

Comment: Several commentators noted that the Wise Point boat ramp provides a safe harbor for recreational anglers and commercial watermen in the event of bad weather. The boat ramps at the Town of Oyster and Kiptopeke State Park do not always provide safe access for commercial or recreational users.

Response: Any boater in distress will be able to use the Wise Point boat ramp as a safe harbor.

Comment: Two comments requested we think about how to provide boat ramp access for emergency vehicles.

Response: We are also concerned that emergency vehicles and personnel have access to the boat ramp. Presently there are 15 complimentary keys issued to a variety of agencies including the Coast Guard, Northampton County, and various law enforcement organizations. When the boat ramp is completed, a sign with emergency contact numbers will be installed and emergency contact numbers will be re-issued to various agencies.

Comment: The Society supports our proposal to prohibit personal watercrafts from launching from the Wise Pont boat ramp and suggested we expand this proposal by prohibiting the operation and landing of personal watercrafts on the refuges.

Response: We do not allow landing of watercraft of any kind on refuge property. As far as operating personal watercraft on refuge waterways, the Department of Interior has been addressing this concern in certain parks and refuges and at some point this refuge may become a part of those regulations. However, most of these waters fall under State jurisdiction and we do not have the authority to deny this use in those areas.

Comment: We received several comments from the Society concerning the Wise Point Boat Ramp expansion. The Society “does not support the development at Wise Point because such development will harm the wildlife and habitat the refuge is intended to protect. The plan details a litany of adverse effects the proposed expansion would have on the ecology of the refuge and, therefore, is inappropriate development in sensitive habitat.”

The Society stated that we did not address the adverse effects of the boat ramp improvements including the expanded parking lot, concession stand, turnouts, and restrooms, and voiced “concerns about contaminants that may be exposed by the dredging and pier/mooring post removal as well as the increased traffic that may result in more litter, vandalism and wildlife disturbance.”

The Society asked about the monitoring and analysis of the effects of the boat ramp expansion, data collection that supports the level of use that will result in habitat degradation or wildlife disturbance, and about the plans to prevent damage to the sensitive barrier islands and refuge plant and animal resources. They questioned the size of the boats launched in relation to the size of the boat ramp, and inquired about the finances involved in the Wise Point boat ramp expansion. Finally, they urged the Service to work with local officials and interests to find a more suitable site for a boat ramp, including looking at whether other boat ramps in the vicinity could be expanded without harm to the environment.

Response: We have identified and described the reasonably anticipated impacts that this use will have on refuge purposes and the National Wildlife Refuge System mission, in both the Draft CCP/EA and the Wise Point boat ramp compatibility determination (CD). As a result, we are designing the boat ramp to minimize these negative effects. For instance, the present parking area is located on an ecologically compromised former dredge fill site. The proposed expanded parking area would not destroy any trees or shrubs. The present portable bathrooms would be replaced with an environmentally friendly facility (potentially composting toilets). The proposed small fee station would be built on a former dredge spoil area. We propose that the fee station be run by a concessionaire, who will help us manage the site under a special use permit and according to refuge regulations. In the draft project design, there is a possibility that the satellite parking lot would not be necessary. However, some fill would be used to create pull-offs or widen the road to ensure safety along the entrance road. Through coordination with regulatory agencies, we would be mitigating the minimal wetland losses. Any adverse effects or impacts that would be caused by the construction are one-time disturbances and are tightly regulated by several agencies, including the County Wetlands Board, State Department of Environmental Quality and US Army Corps of Engineers.

Preliminary contaminant studies have been completed and few contaminants were detected in the surface sediments adjacent to the boat ramp and docks. However, it is doubtful any contaminants are at depth since it is anoxic and the temperature is cooler. Silt catchments and silt curtains would be used during any sediment disturbance. The contaminants of concern in this area generally adhere to sediments and should be contained before being mobilized.

The Wise Point boat ramp has been conditionally closed since we acquired the property two years ago. During that time, we have patrolled the area to protect the refuge from trespass, fire and unauthorized use. In 2003, two large signs informing boaters that Fisherman Island NWR is closed to boat landings were installed. Following the proposed boat ramp expansion, we would restrict boat ramp parking to 75 vehicles, prohibit pets on boats, prohibit the launching of personal watercraft from the refuge, extend the no wake zone in the Virginia Inside Passage, install closed area signs on the barrier islands, require commercial tour guides to take a training course on minimizing human disturbance to wildlife resources, phase out boat docking and install educational signs in the boat ramp area. When the boat ramp is re-opened to recreational use, a full-time Refuge Law Enforcement Officer will provide increased vigilance to these sensitive areas. The Officer will enforce fish and

wildlife conservation laws, refuge regulations; and maintain liaison with special agents, state conservation officers, state police and local enforcement agencies. This increase in law enforcement vigilance in the boat ramp area, barrier islands and marshes will dramatically reduce the severity of the adverse impacts identified in the Draft CCP/EA and CD.

Routine law enforcement patrols will be conducted throughout the year, and as a result, no significant habitat degradation or wildlife disturbance is expected to occur as a result of this use. The patrols will promote compliance with refuge regulations, monitor public use patterns, public safety and document visitor interaction. Patrols will include recording visitor numbers, vehicle numbers, visitor activities and monitoring the locations where the activity takes place to document current and future levels of Refuge use. Patrols will also include the routine assessment of safety conditions and visitor interactions on Refuge property and the barrier islands. Conditions that are or will risk public safety, cause habitat degradation or wildlife disturbance will be identified, monitored and the appropriate action will be promptly taken to correct such conditions.

Our objective in the design of the new ramp is to accommodate a relatively shallow draught fishing boat rather than the deeper draught pleasure boat. Our goal is to facilitate wildlife-dependent recreational activities, such as wildlife observation and fishing.

We worked with local officials and interests to find a more suitable site for a boat ramp, including looking at whether other boat ramps in the vicinity could be expanded. We were unable to find a suitable and available site in the vicinity that would provide the necessary elements for the county, recreational anglers and commercial watermen. The Wise Point boat ramp is a special site because of its deep water, location within the Virginia Inside Passage, proximity to the Bay Bridge-Tunnel complex, extensive aquaculture sites, and marshes and islands which provide a safe harbor for boaters.

The funding needed for this project falls into two categories: one-time construction and annual funding for managing and maintaining the use. We will pursue \$540,000 to improve the entrance road and parking area from the Federal Highway Administration (FHA). An additional \$580,000 would be allocated for construction of the boat ramp, dock and bulkhead, from the Service's maintenance budget. The annual Refuge budget associated with the administration of this non-consumptive use is primarily related to effective law enforcement, answering general questions from the public and partners, monitoring use patterns, monitoring impacts, and documenting habitat degradation or wildlife disturbance. The Fiscal Year 2004 budget allocation for the Refuge is \$559,391 for operations and \$26,800 for maintenance. This current allocation, coupled with our recommendation of increased staffing, is adequate to ensure that the Wise Point boat ramp is compatible with the Refuge purposes and the National Wildlife Refuge System mission. Assuming these budget and staff levels are sustained, it will allow us to provide a high standard of public and resource protection, while eliminating or mitigating potential conflicts.

Comment: The Northampton County Board of Supervisors commented that it has received concerns from its citizens regarding access to the boat ramp. The Board suggested discussing with the Service the possibility of exchanging Raccoon Park (a County-owned in-holding) for the boat ramp. The Board wrote; "it is crucial to keep the ramp open for the vitality of the commercial fishing and aquaculture industries. More than fifty citizens are employed by use of the ramp."

Response: We met with Northampton County Administrator, Lance Metzler, and Board Members Thom Dixon and Jack White on December 10, 2003 to discuss their comments and concerns. We assured them that our proposed action would maintain access to the boat ramp for both recreational anglers and commercial watermen as we describe in our other responses. Subsequent to the December 10th meeting, we researched

possibilities for a land exchange, lease arrangement, or dual ownership of the boat ramp. As we conveyed to them in a March 9, 2004 letter, we do not consider these as valid options based on our review of property records, applicable laws, Department of Interior regulations and Service policy on compatible uses.

Wildlife Observation and Photography, Environmental Education, Wildlife Interpretation

Comment: Virginia Department of Conservation and Recreation encouraged the Service “to include pedestrian nature trails to the extent that the mission of the refuge will allow.” The Coastal Virginia Wildlife Observatory stated that it would support the “continuation and expansion of on-site public education.”

Response: Our Proposed Action would expand pedestrian nature trails. We would develop a trail towards the tip of the peninsula and would add new trails as more lands are acquired. We would also expand our environmental education program to include a Spanish language environmental education program, curriculum-based lesson plans, adopt a local classroom, add teacher workshops, add an Elder Hostel program and develop an environmental education study area.

Comment: The Waste Division of the Virginia Department of Environmental Quality (DEQ) commented that both refuges are Formerly Used Defense Sites (FUDS) that were once used for barracks, an airfield, troop training exercises, firing of artillery guns, or solid waste disposal. Those former activities pose potential hazards to human health. Given the proposals to expand wildlife-dependent public uses on the refuges, DEQ’s Waste Division recommended that the Service work closely with the Norfolk District U.S. Army Corps of Engineers. The Division also recommended that the Service consider a public awareness program for visitors.

Response: In the Draft CCP/EA (Chapter 3), we describe the Contaminant Assessment Process (CAP) conducted on both refuges. This process gathers information regarding environmental contamination and human health and safety risks on refuges. It also provides recommendations on methods to definitively assess risk and/or remediate threats. We have also held meetings with both DEQ and the Corps of Engineers regarding the FUDS sites. We agree to include in our Proposed Action additional language which specifically mentions coordination with both agencies to ensure all necessary clean-up and safety work is completed before we open any new refuge areas to unrestricted public access. We will also specifically identify that the Mine Commander’s Bunker will be sealed to prevent entrance and Battery 227 will be locked to prevent access if Fisherman Island Refuge is open to unsupervised access. With our plan to eliminate these threats to public safety, we believe a “public awareness program” would cause undue alarm, and therefore, we do not feel such a program is necessary.

Comment: One individual suggested restoring the World War II bunkers on the refuge and including them in an interpretive program focused on local wartime history.

Response: We presently have some interpretation of the bunkers and the importance of the area during World War I and World War II. The nature trail goes through a section of bunker and has steps to the top of the bunker.

Firearms Range

Comment: The Society supports the proposal to relocate the firearms range.

Response: We appreciate the support for this proposal. It is important to recognize, however, that the firearms range is located on Northampton County property, adjacent to the Eastern Shore of Virginia NWR. It is necessary that the County be a key partner in implementing this recommendation and facilitating the relocation.

Comment: An individual questioned whether noise from the firearms range disturbs migratory birds and visitors any more or less than noise from shotguns during the hunt season. The individual also questioned the implication that it is less disturbing for hunters to walk through the understory, where migratory birds find feed and rest, than it is for people to gather and use the firearms range.

Response: Depending on the number of law enforcement officers that are qualifying on a given day, there could be 1,000 rounds fired. Firearms qualification occurs throughout the year, whereas the firearms hunt is held on seven days in late November and December, when the numbers of Neotropical migratory birds are declining. During any given hunt day there are probably no more than 30 shots fired. This would equate to approximately 210 shots spread over a five week period. We realize that hunters will produce some disturbance while in the field, but hunters generally walk to a hunt stand and remain there quietly until a deer passes in the vicinity of their stand. The benefits of reducing the deer herd, and maintaining high quality understory habitat for migratory birds outweighs this minimal disturbance.

Artificial Structures

Comment: One individual suggested keeping the communications tower on the Eastern Shore of Virginia Refuge as a means for generating income for the Refuge.

Response: The tower was erected on the Cape Charles Air Force Base by the C&P Telephone Company with a 50-year lease between the U.S. Air Force and C&P. The lease is set to expire on July 15, 2007. This lease was honored by the Service through a cooperative agreement when the property was transferred in 1984.

There are numerous studies documenting high bird mortality from collisions with communications towers. The Service developed national guidelines on communication towers in August 2000 stating that towers should not be sited in or near wetlands, sensitive habitats, or other known bird concentration areas, including national wildlife refuges. This refuge lies within a hemispherically important fall migratory bird route, where millions of birds pass through. The risk to migratory birds of maintaining this tower is too high. While we intend to honor the lease until 2007, as we stated in the Draft CCP/EA (Chapter 2), our Proposed Action is to discontinue the lease and have the tower removed after that date.

Contaminants

Comment: The Virginia Department of Environmental Quality's Waste Division recommended that the Service determine whether hazardous waste is or would be generated by the proposed boat ramp construction or by current utilization of the firearms range. The Division also requested more information about the proposed construction project in the Draft CCP/EA to determine whether the refuge will need to obtain appropriate permits.

Response: Sediment samples were taken from the boat ramp and areas north and south of the ramp (near boat dockage) during summer 2003. The sediments were analyzed for total metals, total organic carbon, grain size, organochlorine, PCB's, and aromatics. A final report of these results is not currently available; however, the preliminary report shows that no results were above the Effects Range Low (ERL) values.

The firearms range is not located on refuge property. However we do manage its use and maintain the site for Northampton County. Inherently firearm use does produce hazardous byproducts, including, but not limited to, lead, arsenic and antimony. In 1997 the Corps of Engineers performed some contaminants testing on this formerly used military site. They collected soils from the backdrop at the range and found elevated levels of the three metals mentioned above. The refuge requested permission in 2000 and 2001 to do additional contaminants testing behind and adjacent to the firearms range to test if these contaminants were migrating from the primary range site. We did not receive permission from the County to complete this testing. However, in 2003 we did complete contaminants testing in the State-owned marsh behind the firearms range. A final report of the findings is not presently available. We are concerned about the potential for elevated contaminant levels and have reached an agreement with the County to restrict use at this range to law enforcement agencies from the Eastern Shore of Virginia only, until another range is constructed offsite.

The Service is legally committed to obtain the appropriate permit approvals prior to initiation of any construction project.

Field Research Support

Comment: The Coastal Virginia Wildlife Observatory (CVWO) commented that it would “endorse continuation and expansion” of field research projects on the refuge aimed at providing scientific data about birds, butterflies and other local wildlife.

Response: Research has increased our knowledge of the critical role the Eastern Shore of Virginia NWR plays in avian migration and we support management-related research as our highest priority. Other research is permitted as resources and time allow. However, all research must meet certain minimum standards and be completed such that results can be peer-reviewed.

Suggestions for Other Alternatives

Comment: One individual wanted to see more options other than the four alternatives presented, and suggested “mixing and matching” the four alternatives to come up with something different. Two comments proposed that the Service meet with a group of people representing recreational, commercial, State and county interests to review the plan and make additional suggestions.

Response: It is important to remember that respective alternatives as presented in the Draft CCP/EA constitute “thematic” groups of management actions, and in many cases switching individual actions or strategies would not be consistent with the themes. While we may move selected actions for sound reasons, we prefer to maintain the thematic groupings for evaluation purposes. We have met with a variety of people and agencies while producing the Draft CCP/EA. We held several public hearings to gather input from anyone who has an interest in the future management of these refuges. Additionally, the public comment period has given people another opportunity to provide input. Our Regional Director, will make the final decision taking into consideration all the comments we received on the Draft CCP/EA.

Cultural Resources

Comment: The Virginia Department of Historic Resources stated that both refuges contain several identified cultural resources and encouraged the Service to take these resources into consideration throughout the planning process. The Service was also encouraged to continue consulting with the Department on cultural resource issues as necessary, and as required by law (Section 106 and 110 of the National Historic Preservation Act).

Response: We are committed to fulfilling our legal mandates related to cultural resources and to coordinate with the Department of Historic Resources. No action will be taken that compromises the integrity of nationally historic cultural resources.

Other Uses

Comment: One individual requested using the Refuge for a casting contest organized by Sportcast USA.

Response: Although this is an interesting idea, the refuge does not have many large open areas in which to accommodate such a contest. Kiptopeke State Park does have many large open areas. We would propose this activity occur off the Refuge, possibly at the state park.

Comment: The Society suggested the plan state more explicitly that a public use is only permitted on the refuge if the Service has determined it is compatible.

Response: The Draft CCP/EA specifically states that the NWRSA requires that “all existing or proposed refuge uses must be compatible with the purposes of the refuge and the mission of the system....”. Once approved, only those refuge uses we have determined compatible through the compatibility determination process may be allowed. The compatible uses we proposed in the Draft CCP/EA were presented in Appendix F. In this final CCP they are included as Appendix D.

General Support for Alternative B, the Proposed Action (No response warranted)

Comment: The VDGIF supports Alternative B, Proposed Action, to increase monitoring of federal-listed species and other species and habitats of special concern and to eradicate invasive species.

Citizens for a Better Eastern Shore (CBES) wrote in support of the Proposed Action (Alternative B), as it will “positively impact the future of our community.” These positive impacts include protecting wildlife and their habitats, and boosting the local economy by offering ecotourism and by improving facilities for recreational anglers and commercial watermen.

CVWO commented that “Alternative B seems to provide an excellent approach to achieving the goals of conservation of wildlife and their habitats.”

The Northampton County Board of Supervisors commented that Alternative B is “the most beneficial to the citizens of the County of Northampton, while accomplishing the goals and objective of the U.S. Fish and Wildlife Service.”